

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
Case No. 2:20-cv-00041-DCLC-CRW
ULTIMA SERVICES CORPORATION,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF AGRICULTURE, et al.,

Defendants.

LYNETTE T. STEVENSON
and NICOLE STEWART,

Pro Se Movants

FILED

JAN 08 2025

Clerk, U. S. District Court
Eastern District of Tennessee
At Greeneville

NOTICE OF CLARIFICATION

To the Honorable Cynthia Richardson Wyrick, United States Magistrate Judge:

Nicole Stewart, appearing pro se, respectfully submits this Notice of Clarification to address her role in the above-captioned matter. This clarification is submitted to ensure proper understanding of the respective roles and interests of the Movants in the case and to avoid any procedural confusion.

I. Role of Nicole Stewart as Subcontractor

1. **Limited Involvement as Subcontractor:**
2. Nicole Stewart's involvement in this matter arises from her role as the owner of Aneu Strategies Group, Inc. ("ASG"), a subcontractor engaged by DALC Credit Solutions Co. ("DALC"), owned by Lynette T. Stevenson. ASG provided IT services for contracts procured by DALC.
3. **Non-Primary Role in Federal Contracts:**

ASG was not the primary contractor in any of the federal contracts at issue. Nicole Stewart's role was to support DALs by performing subcontracted services under the agreements.

II. Clarification of Movants' Roles

1. Primary Role of Lynette T. Stevenson:

Lynette T. Stevenson, as the principal owner of DALs, was the primary party pursuing federal contracts and initiating the claims in this matter. The claims and evidence presented primarily concern systemic harm to DALs caused by the defendants' failure to enforce the Rule of Two.

2. Supportive Role of Nicole Stewart:

Nicole Stewart's interest in this matter is limited to the harm caused to ASG as a result of systemic barriers that prevented DALs from obtaining federal contracts. Nicole Stewart supports the claims brought by Lynette T. Stevenson but does not seek to act as the primary Intervenor Plaintiff.

III. Request for Clarification of Designation

Movant Nicole Stewart respectfully requests that the Court clarify her designation in the case to reflect her role as a supporting party and subcontractor with limited claims. Specifically, Movant requests:

1. Designation of Lynette T. Stevenson as the Primary Intervenor Plaintiff:

Recognizing DALs's primary role in the claims and systemic harm asserted in this case.

2. Acknowledgment of Nicole Stewart's Limited Role:

Clarifying Nicole Stewart's interest in the case as arising from her subcontracting relationship with DALs and the systemic harm that indirectly impacted ASG.

IV. Conclusion

This Notice of Clarification is submitted to ensure accurate understanding of the respective roles of the Movants and to facilitate efficient and fair resolution of the claims

presented. Movant Nicole Stewart respectfully requests that the Court take this clarification into account in all further proceedings.

Respectfully submitted,



Nicole Stewart


Pro Se Litigant

1418 N. Cass St.

Milwaukee, WI 53202

Email: neiko@neikostewart.com

Signature: _____



Lynette T. Stevenson

Pro Se Litigant

(O): 5246 Simpson Ferry Road #355

(H): 5767 Albany GRN

Westerville, OH 43081

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Pro Se Movants

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2025, I served a true and correct copy of the following document:

1. Notice of Clarification

by the following methods to the parties listed below:

Served via Email:

1. David Fishman

U.S. Small Business Administration

Email: david.fishman@sba.gov

2. Kacie Candela

U.S. Department of Justice

Email: kacie.candela@usdoj.gov

3. Aryn Null

U.S. Department of Justice

Email: aryn.null@usdoj.gov

4. Carlotta Wells

U.S. Department of Justice

Email: carlotta.wells@usdoj.gov

5. Lynette T. Stevenson

Pro Se Litigant, DALs Credit Solutions Co.


Email: ls@dalscreditsolutions.com

Method of Service:

☒ **Email** (via the provided email addresses)

Dated: January 6, 2025

Respectfully submitted,



Nicole Stewart

Pro Se Litigant

1418 N. Cass St.

Milwaukee, WI 53202

Email: neiko@neikostewart.com

Signature:



Lynette T. Stevenson

Pro Se Litigant

(O): 5246 Simpson Ferry Road #355

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Westerville, OH 43081

January 6, 2025

Clerk of Court

United States District Court
Eastern District of Tennessee
Attention: Jason C. Keeton, Division Manager
220 W. Depot Street, Suite 416
Greeneville, TN 37743

Re: Case No. 2:20-cv-00041-DCLC-CRW

Filing of Notice of Clarification

Dear Clerk of Court,

Enclosed please find the following documents submitted for filing in the above-referenced matter:

- 1. Notice of Clarification**
- 2. Certificate of Service**

These documents are filed on behalf of Nicole Stewart and Lynette T. Stevenson, both appearing as Pro Se Litigants. The **Notice of Clarification** is submitted to provide the Court with an accurate understanding of the respective roles of the Movants in this case and to avoid any procedural confusion.

Please process these filings and enter them into the docket for consideration by the Court. If there are any questions or additional requirements, please feel free to contact us at the emails provided below.

Thank you for your assistance.

Respectfully,

A handwritten signature in black ink that reads "N Stewart". The signature is written in a cursive, flowing style.

Nicole Stewart

Pro Se Litigant
1418 N. Cass St.
Milwaukee, WI 53202

Signature: _____

Lynette T. Stevenson

Pro Se Litigant

(O): 5246 Simpson Ferry Road #355

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Westerville, OH 43081

Enclosures:

1. Notice of Clarification
2. Certificate of Service